Hearing Session 2

HOUSING PROVISION

9.30 am, Wednesday 7 September 2016

Joint Local Development Plan
Anglesey and Gwynedd

CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL

This Statement has been produced by the Isle of Anglesey County Council and Gwynedd Council to set out their response to the matters and issues raised by the Inspector for the Hearing relating to the Housing Provision in the submitted Anglesey and Gwynedd Joint Local Development Plan.

This Statement relates to the elements of the Plan that have been raised by the Inspector as matters to be discussed. Where appropriate the Statement draws on and cross-refers to the main sources of information used in the preparation of the Plan such as the outcomes of public consultation, the Sustainability Appraisal, the Background Documents and the supporting Topic Papers. Document reference numbers are given where appropriate.

For the purpose of clarity within this statement any Matters Arising Changes suggested to the Deposit Plan and/or a Focussed Change to the Plan, is shown in bold **Red** and underlined. Any Focussed Change text to the Deposit Plan is shown in **Bold** underlined text.

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Matters & Issues Agenda

1 Introduction

2 Procedural Matters

3 Is the housing requirement figure of 7,184 appropriate to meet the needs of the Counties over the Plan period?

3.1 **Response** – Yes. The Councils consider that the Plan provides a sound strategy to provide the scale of new homes to meet the housing requirement within the Plan area. The approach is based on up to date and robust evidence, which assesses the level of housing required and is effective on the basis that the Councils are confident that the approach is deliverable. The work undertaken to calculate the housing requirement follows national policy and takes account of local circumstance and consultation. The Plan's housing requirement figure has been informed by consideration of the Welsh Government's demographic trend based projections and a robust assessment of other factors that are considered to impact on housing requirement and delivery in the Plan area (described in response to question 3a below). Topic Paper 4 – Topic 4B (PT.08 – PT.010) sets out the Councils' consideration of the projections and the local influencing factors. This Statement further clarifies the matter.

3a Has the Plan been informed by a robust assessment of the housing requirement, having regard to Planning Policy Wales?

3.2 **Response** –Planning Policy Wales (PPW) (Edition 8 January 2016) establishes that meeting people's need for the right type of home is an important objective. The Welsh Government's approach is to provide more housing of the right type and offer more choice (paragraph 9.1.1). An important part of achieving sustainable development is ensuring that there are enough homes to meet the current and future demand. Paragraph 4.4.3 of PPW states that the aim is to "ensure that all local communities – both urban and rural – have sufficient good quality housing for their needs, including affordable housing for local needs and for special needs where appropriate, in safe neighbourhoods." Furthermore, PPW states that "the level of housing provision to be proposed over a plan period must be considered in the context of viability and deliverability." (Paragraph 9.2.2).

3.3 Additionally, in paragraph 9.2.2 PPW provides an overview of the evidence required to enable a local planning authority to have a "'clear understanding of the factors influencing housing requirements in their area over the plan period."

3.4 Paragraph 9.2.2 PPW also advises that the latest Welsh Government local authority level household projections for Wales should form part of a plan's evidence base. Previous editions of PPW (published at the Preferred Strategy and Deposit Plan stages) had stated that the projections should form the starting point for considering the dwelling requirement of a Plan.

3.5 In accordance with PPW, the Preferred Strategy preparation process considered the 2008-based Welsh Government population and household projections (as described in a number of Topic Paper, which include Topic Paper 4 – PT.008). During the preparation of the Deposit Plan these projections were replaced by the 2011-based population and household projections. Background Papers "Explaining the difference between the Welsh Government 2008-based and 2011-based projections" covering Anglesey and Gwynedd (DC.017 and DC.018), as the titles imply, provide an overview of the reasons for the different results of the two projections. The 2011-based projections identified a lower requirement for housing units in the Plan area during the Plan period, particularly for Anglesey. The following sets out the differences:

i. The indicative dwelling requirement for Gwynedd for the 15 year period falls significantly from a total of 6,380 predicted in the 2008-based projections to either 5,000 (5 year migration trend) or 5,730 (10 year migration trend).

ii. The indicative dwelling requirement for Anglesey for the 15 year period falls more significantly from a total of 3,880 predicted in the 2008-based projections to either 990 (5 year migration trend) or 1,845 (10 year migration trend).

3.6 The Councils, in accordance with PPW, has therefore considered the most recent household projections as part of their assessment of the housing requirement for the Deposit Plan.

3.7 Paragraph 9.2.2 advises that alternative modelling may be undertaken to inform the decision about the requirement for housing. The Councils agree with this approach since the Welsh Government's projections are always trend based providing estimates of the future numbers of households and are based on population projections and assumptions about household composition and characteristics. Alternative scenarios were therefore considered, which are described in the various iterations of Topic Paper 4 (PT.008 – PT010) and described in the Councils' Statement for Session 1 of the Hearings.

3.8 As referred to in paragraph 3.3 local planning authorities are also required to consider factors that are important to deliver on the Plan's vision, objectives and strategy. These included: the impact of proposed and anticipated investment and economic growth; the need to address the requirement for a range of housing to address the needs of local communities, including social and intermediate affordable housing, suitable market housing (tenure) and different types of households (young and ageing); the sociolinguistic vitality of Welsh in communities; deliverability; and the Plan's Vision and Objectives. An overview of all the factors is provided in Topic Paper 4 (which draws on information set out in additional Topic and Background Papers).

3.9 The Councils therefore consider that the Plan's housing requirement figure of 7,184 has been informed by consideration of the Welsh Government's demographic trend

based projections, alternative scenarios, and a robust assessment of other factors that are considered to impact on housing requirement and delivery in the Plan area.

3b	**In identifying the requirement figure, has adequate regard been paid to the Welsh Government household and population projections?**

3.10 **Response** – Yes. As indicated in paragraph 3.5 above, the most recent Welsh Government household projections for local authorities were published during the Deposit Plan preparation process. They were published in February 2014 and replaced the 2008- based projections, which had been considered in the preparation of the Preferred Strategy. The following table provides details of the principle and alternative/ variant 2011-based household projections for Anglesey and Gwynedd (the County) for the Plan period:

Anglesey	**Principle projection**	**10 year average migration**	**Zero migration**
2011	30,700	30,700	30,700
2026	31,500	32,300	31,200
Growth 2011 – 2026	800	1,600	500
Gwynedd (county)	**Principle projection**	**10 year average migration**	**Zero migration**
2011	52,400	52,400	52,400
2026	56,700	57,300	54,600
Growth 2011 – 2026	4,300	4,900	2,200

Table 1: alternative/ variant 2011-based household projections for Anglesey and Gwynedd (the County) for the Plan period (Household Projections for Wales – SDR 35/2014)

3.11 Based on the above projections, the number of additional households that are anticipated to form according to the Welsh Government's published methodology range from between 500 and 1,600 in Anglesey and 2,200 to 4,900 in Gwynedd.

3.12 The Welsh Government projections are "trend" based, relying on recorded demographic changes over a specific period, which are then used to make assumptions about the area in the future. In the case of the 2011 based projections, much of the period that formed the basis for them therefore reflects a challenging economic period. During this period, the recession affected the country severely affecting growth and confidence. The Ministerial letter issued by Carl Sargeant in April 2014 highlighted that the principle projections had been affected by recent

economic conditions and advised local planning authorities to also consider all sources of local evidence. Unlike previous Welsh Government projections, the 2011-based projections also include a 10 year average migration, which does take account of peaks and troughs.

3.13 The implications of following purely demographic led assumptions and trends, which underpin the Welsh Government household projections, therefore required exploration in order to ensure that the Plan facilitates an appropriate level of housing that addresses the Plan's vision and objectives. The proposed level of future housing provision set out in the principle and alternative Welsh Government projections for Anglesey in particular seem to be inadequate to ensure the success of the overall economic strategy for the area. Objectors have expressed concerns that if the Welsh Government projections were taken forward into the Plan, they would facilitate further in-migration that would have a detrimental impact on the Welsh language and the age profile of Gwynedd, i.e. exacerbate an already ageing population. Exploring other options would also help the Councils justify a deviation from the Welsh Government should this be required.

3.14 At the Deposit Plan preparation stage, therefore, the Council commissioned Edge Analytics to set out the dwelling requirements arising from the Government's projections as well as a number of alternative scenarios for Anglesey and the Gwynedd Local Planning Authority, i.e. the Plan area. The alternatives were as follows:

Table 2: Welsh Government and alternative scenarios explored at the Deposit Plan preparation stage (extract from DC.016 "Population and household projections – assumptions, methodology and scenario results.")

Scenario Type	Scenario Name	Scenario Description
Official Projections	**'WG-2011'**	This scenario mirrors the WG 2011-based population projections for Gwynedd and Anglesey and is the official 'benchmark' scenario.
	'WG-2008'	This scenario mirrors the WG 2008-based population projections for Gwynedd and Anglesey and is included for reference only on the scenario summary charts.
Alternative Trend-based Scenarios	**'Natural Change'**	In- and out- migration rates are set to zero. Population growth is driven by natural change only.
	'PG-5yr'	Migration assumptions are based on the last five years of historical evidence (2007/08 to 2011/12).
	'PG-10yr'	Migration assumptions are based on the last ten years of historical evidence (2002/03 to 2011/12).
Jobs-led Scenarios	**'Jobs-led (URS Base)'**	Population growth is determined by the change in the number of jobs, as defined in the URS 'Base Case' employment forecast for Gwynedd and Anglesey.

Scenario Type	Scenario Name	Scenario Description
	'Jobs-led (URS 4)'	Population growth is determined by the change in the number of jobs, as defined in the URS 'Scenario 4' employment forecast for Gwynedd and Anglesey.
	'Jobs-led (Wylfa)'	Population growth is determined by the change in the number of jobs, as defined in the URS 'Wylfa New Build commencing in 2018' employment forecast for Anglesey only.
Dwelling-led Scenarios	**'Dwelling-led (Preferred)'**	Population growth is determined by the change in the number of dwellings, as defined in the Councils 'Preferred Strategy' (+511 dwellings per year).
	'Dwelling-led (Pre-Recession)'	Population growth is determined by the change in the number of dwellings, defined using the average 'pre-recession' completion rate (+424 dwellings per year).
	'Dwelling-led (Recession)'	Population growth is determined by the change in the number of dwellings, defined using the average 'recession' completion rate (+359 dwellings per year).

3.15 The alternative scenarios were selected on the basis that they would provide an insight into: continuation of past provision (market signals) – a reflection of what the construction industry has been able/ willing to deliver and household formation rates; and, the level of housing required to address expected future jobs located within the Plan area. 'Sensitivity' scenarios were also developed to examine the implications of changes to the underlying commuting ratio assumptions in the jobs-led scenarios. In recognition that jobs-growth on Anglesey and in Gwynedd, coupled with successful strategies to improve skills and the type of jobs available, will likely lead to changes to commuting patterns, two alternative jobs-led 'sensitivity scenarios' have been developed, in which the commuting ratios have been altered over the 2012–2026 forecast period. In the first sensitivity ('SENS1'), the commuting ratios are incrementally altered from their 2011 Census values, returning to their 2001 Census values by 2026. In the second sensitivity ('SENS2'), the change seen historically is continued over the 2012–2026 forecast period. Application of these sensitivity scenarios would alter the in-commuting and out-commuting patterns. Paragraphs 3.24 to 3.29 in the "Population and household projections assumptions, methodology and scenario results" report (DC.017) describe the sensitivity scenarios. Chapter 4 of the aforementioned report provide the scenario outcomes an overview is provided in in Topic Paper 4A and 4B (PT.009 & PT.010).

3.16 For the core scenarios, i.e. without the sensitivity allowance, the average number of dwellings per annum for Gwynedd ranged from 170 – 415, whilst the average number of dwellings per annum for Anglesey ranged from 52 – 422.

3.17 Any level of housing provision should also be linked to the key issues the Plan is seeking to address, and not just become a mathematical calculation.

3.18 The following paragraphs provide an overview of local factors that were considered in order to make an informed judgment and decision about the level of housing provision. They describe factors that can promote or hinder growth in an area. The

factors are socio-economic, environmental, infrastructure and policy objectives. A colour coding system seeks to give an 'at a glance' assessment. Behind the assessment of local factors it was also considered sensible to bear the following in mind:

- Is there evidence that household formation has been restricted?
- Do market signs suggest the need to add to the housing stock to improve affordability?
- Will the growth level be adequate to address the need for affordable housing?
- Should a higher number of housing be considered to increase the supply of affordable housing?
- Will the growth level support the anticipated growth in jobs, or should consideration be given to increasing the supply of housing to support economic growth?

Table 3 Local factors and commentary

A case to consider some growth in the future	**Neutral factor – not a factor that in itself necessarily puts forward a case for or against additional growth**	**A case not to support growth in the future**

Factors considered	**Need for growth**	**Commentary**
• Household formation - more households will be created during the Plan period. Even the 'natural change'[1] scenario creates more households: an increase of 6% and 2% in Gwynedd and Anglesey (in that order) during the Plan period. Life expectancy rates and reducing household size, including more 1 person households, contribute to the need for additional housing.		Many of these will require new houses. The total amount of housing units/ the level of growth required during the Plan period depends on a number of factors. These include the ability of new households to obtain mortgages or afford to rent; the ability of developers to obtain commercial Finance – developers won't normally build houses if they aren't confident that the houses can be sold; availability of the correct types of housing in the right place.
• Household composition – low income levels compared to local house prices in parts of the area, changes linked to obtain mortgages contribute to cases where young adults live at home longer. The 2011 Census shows that 16% of single households in Gwynedd and		We can't plan on the basis that trends in the housing market seen since the recession will continue throughout the Plan period. There is pressure for more initiatives to promote home ownership or to add to rented housing stock and to change lending regulations. Both Councils are planning for local economic change. All in all, this could mean more local households than seen in recent years looking

[1] Natural change – nil migration - to illustrate the projected household fformation of each local authority if there were no future inward or outward migration

Factors considered	Need for growth	Commentary
17% on Anglesey include non-student young adults.		for housing during the Plan period. The Plan shouldn't restrict opportunities for young adults to create households themselves or in partnership with other young adults. Nonetheless it is sensible to be realistic about what could be achieved.
• the Local Market Housing Study (which includes information about, and an analysis of local incomes, local house and land prices, social housing waiting lists, and the Tai Teg register) confirms that it is necessary to add to the affordable housing stock (intermediate and social) in order to tackle the existing delay.		All the affordable housing needs studies show that there is a backlog in the need for affordable housing that could continue into the future. Therefore, the Councils are justified in trying to ensure the most viable level of affordable housing in the future. The Plan has an important role to help the Council, housing associations, housing trusts, private secure to provide housing to satisfy the needs of different households. This will include housing subject to 106 Agreements, housing managed by housing associations, private sector housing, or housing units that 'affordable' due to market forces (e.g. that the housing isn't in a high market demand area, the units are designed to be affordable).
• low local incomes mean that local occupants are unable to compete for housing against migrants who are likely to have good equity to buy houses in some locations in the Plan area.		The Plan can help to tackle this factor by including policies that promote the appropriate type of housing units at a rate that is appropriate in communities that are under pressure, in order that local households are able to stay in the area, e.g. by including local market housing.
• all the current housing stock is not available to buy or rent throughout the year as some parts of the area are popular for buyers of second homes or holiday homes or accommodation for students. Therefore, permanent occupants are competing for existing houses with temporary occupants.		Planning permission isn't required to use housing units as second homes. There is no evidence to demonstrate that the area won't continue to be popular to visitors during the Plan period. Although the University and the private sector provide alternative purpose built accommodation for students, which can release some of the housing stock back into the market, there is no evidence to demonstrate that some students won't continue to choose to live with each other in housing.
• in April 2014, there was planning permission for 1,476 housing units under construction in the Gwynedd planning area and 468 had been completed since 2011,		There is no evidence available to demonstrate that land availability is a barrier to development. It is important that the Plan is sufficiently flexible to ensure choice and competition.

Factors considered	Need for growth	Commentary
whilst there was planning permission for 1,370 housing units under construction in Anglesey and 503 had been completed since 2011. The Candidate Sites Register shows that there is plenty of available land.		
• the annual construction rate has been lower on average than what was projected in the Unitary Development Plan and lower than what was seen in the past in Anglesey. This could mean that there is a shortfall of new housing. In turn this could lead to higher house prices in popular areas, an unsatisfactory mix of housing available to new households or those that wish to move. For example, 342 housing units were completed in Anglesey during 2011 – 2013, whilst 292 housing units had been completed during the same period in Gwynedd.		The slow down in house building in the area reflects the national situation. Nonetheless, the evidence about households with more young adults, occupancy rates, and household composition together is a sign of demand and need that isn't being addressed and an imbalance in the local housing market. The Plan needs to promote a choice of land/ buildings to develop in order to: help to address the anticipated slow and regular economic improvement; positively respond to local economic opportunities that are being planned during the Plan period; positively respond to the Councils' aspirations to create and maintain sustainable communities. We must ensure that the requirement is one that can be realised and that the sites are ones that can be delivered.
• the housing market is currently generally weak. This poses a challenge for housing providers (viability) which could mean no development, less Section 106 Agreement affordable housing units and less housing variation.		The Plan must be realistic about what can be achieved and when. Careful consideration must be given to deliverability and viability. In terms of housing requirement we must demonstrate that we can maintain a continuous 5 years supply of land for housing. This could mean that it wouldn't be sensible to raise the housing figure excessively.
• the local and national economy is expected to strengthen during the Plan period, e.g. as a result of developing Wylfa Newydd, and delivery of other job creating projects. This is expected to mean that more local households could be in a position to buy or rent houses on the open market and can afford to move to a social or intermediate affordable house.		The Plan must promote a choice of land/ buildings to develop in order to address the economic improvement that is forecasted and respond positively to local economic opportunities that are being planned during the Plan period. The Plan needs to be able to facilitate the delivery of jobs in a sustainable manner
• local and regional economic strategies are planning for a		

Factors considered	Need for growth	Commentary
positive change, which means that more local households could buy or rent houses.		
• there will be a need for thousands of employees to build Wylfa Newydd and associated developments such as accommodation for employees, new roads, and logistic sites. The options for construction employees' accommodation include using houses from the existing stock and new houses which could then transfer to the open market or the affordable housing stock.		
• key facilities and services in settlements are being lost.		The lack of key facilities and services in settlements means that it wouldn't be sensible to direct too much growth to them. Where they are still available or can be enhanced or made available, growth can promote balanced communities that could help to maintain them.
• shortfall in the physical or community infrastructure.		The Plan must be realistic about what can be achieved and when (including the availability of infrastructure). We can influence infrastructure providers' programmes, avoid locations that aren't reasonable/ viable to fill gaps in infrastructure, formulate policies that promote phased development, or use planning mechanisms to ensure that the infrastructure is available in a timely manner.
• less communities in 2011 with 70% or more able to speak Welsh and a lower % of Welsh speakers in some of the communities which had more than 70% Welsh speakers (compared with information from the 2001 Census).		In order to for communities to survive 'locally' available employment opportunities, an ability for different age groups to live and rear their families, and vital communities are required, no matter which country is being considered. In terms of the language there are two sources that create Welsh speakers – the family and the language system. Planning policies that promote an adequate supply of housing and a variety of employment opportunities can help to maintain and create balanced households. Additionally, where evidence suggests that proposed unrestricted development could weaken social Networks around the family and school, planning mechanisms could be used to help to reduce these risks.
• prominent correlation between the availability of appropriate local jobs, appropriate local housing units and the existence of the Welsh language, but several other factors impact the language, e.g. bilingual education, the workplace's language policy, colleges and		

Factors considered	Need for growth	Commentary
universities' language policy, opportunities to speak Welsh during recreational time, resources to immerse adults and older children in the Welsh language, attitude towards the language		
• important sites on a regional and national level to nature conservation or in terms of landscape, risk of river or ocean floods or landslides		Locations where development could destroy the features that form the basis of a nature conservation designation and locations where there is an acknowledged risk to life can be avoided. There is no evidence to demonstrate that land availability outside these sensitive areas is a barrier for development.

3.19 The Councils have established that trend- based projections do not make allowances for the effect of any local or central government policies or changes in household formation rates or future population levels, which can be affected by many socio-economic factors. The Councils also considered the context within which the 2011 based principle projections were prepared.

3.20 There are a number of current challenges for the Plan area to face, (as described above and in Topic Paper 3A Population and Housing (PT.007), background documents that explain the difference between the Welsh Government 2008 – based and 2011 – based projections (DC.017 and DC.018)). These include the extent of the recession, household formation, affordability, build rates. Economic changes are a key driver affecting housing demand and household formation rates. It is therefore considered that it wouldn't be appropriate for the Plan to facilitate a level of growth that couldn't be delivered.

3.21 Various Topic Papers, Background Papers and Statements to this Examination show that there are a number of emerging and future economic drivers that are likely to have an impact on the demand for housing in the Plan area. Welsh Government has designated two Enterprise Zones within Anglesey and Gwynedd, which are aimed to facilitate job creation. The Anglesey Enterprise Zone covers the whole Island, with a number of specific sites being targeted. In response to a range of nationally and regionally significant energy related projects emerging within the Plan area, the Isle of Anglesey County Council established the Energy Island Programme. Supported by the subsequent award of one of the aforementioned Enterprise Zone status by Welsh Government, the Energy Island Programme has already acted as a catalyst to investment and economic growth.

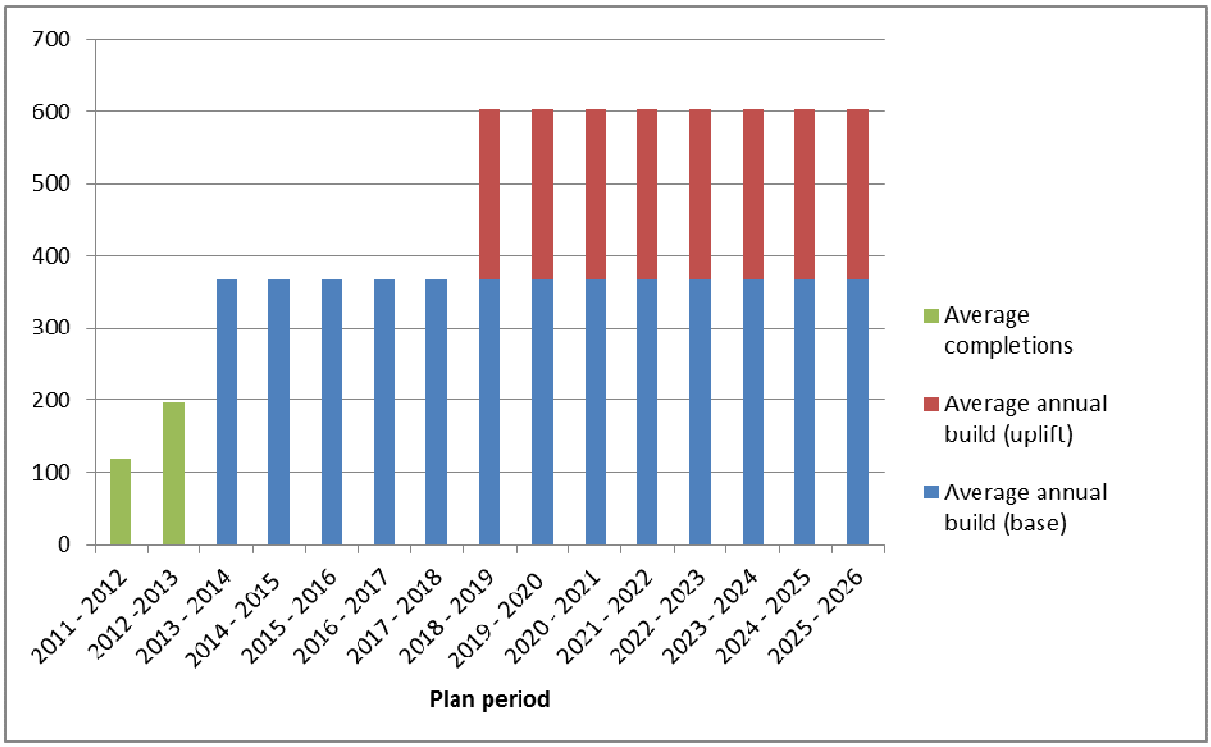
3.22 A number of projects have the benefit of planning consent, e.g. Land and Lakes (anticipated to provide 400 construction jobs and 600 operational jobs); Msparc – a science park linked to Bangor University (anticipated to provide approximately 100 construction jobs and approximately 300 operational jobs with Phase 1 which could increase to approximately 700 should there be a Phase 2). Wylfa Newydd will be the subject of an application for a Development Consent order (DCO) in 2017. Current estimates provided by HNP indicate that construction will peak in 2022/23 when

approximately 8,500 -10,000 construction workers will be employed at peak (HNP EIA Progress Report 2016). This doesn't include facilities management staff, operational staff required during the construction period or jobs created indirectly or via local expenditure in the Plan area.

3.23 Given the available evidence and the factors, particularly deliverability, the Councils consider that the housing requirement figure of 7,184 strikes the appropriate balance between demonstrating effective deliverability and maximising the area's role in responding to evidenced need linked to the transformational economic opportunities. The housing requirement is made of the following elements:

- the number of new housing units built 2011 – 2013; and
- a dwelling-led recession projection for 2013 – 2026 for each local planning authority to reflect a level of house building that is achievable without the anticipated transformational economic changes, - a base allowance; and
- an allowance for an average annual 'market uplift' for each local planning authority in years 2018 – 2026 to respond to anticipated demand linked to the transformational economic changes.

The graph below describes the 'make up' of the anticipated average annual delivery. This is for illustration purposes only. Details of the anticipated annual trajectory are included in Topic Paper 20A Housing Trajectory (DA.023).



3.24 The anticipated 'market uplift' is linked to the jobs-led projections, taking account of the 'Sens 1' sensitivity scenario. In considering which jobs- led projection would be most suitable for the Plan area and the Plan period, the Councils considered that the 'Jobs-led (URS Base) Sens 1 would reflect the anticipated opportunities for the Gwynedd Local Planning Authority area. This would reflect the fact the geographical spread of the area. Sens 1 compared to Sens 2 would better reflect Gwynedd Council's aim to provide more opportunities for local households to stay in the area.

Under the 'SENS1' scenario alternative, there is a reducing net in-commute to Gwynedd. Under this scenario fewer people would be travelling into Gwynedd for work, increasing the proportion of jobs that would be taken up by local residents.

3.25 On the basis that more job opportunities will be created on the Island, it was considered that the 'Jobs-led (URS 4)' would better reflect the anticipated opportunities. It was also considered that Sens 1 compared to Sens 2 would also provide a more realistic level of growth as well as reflect the Council's aim to provide more opportunities for households to live and work on the Island. Under the 'SENS1' scenario alternative, there would be a reducing net out-commute from Anglesey. Fewer people would be travelling out of Anglesey for work, reducing the need for additional net in-migration to satisfy the jobs-growth target.

3.26 It is recognised that to effectively deliver this level of growth over the Plan period will require a higher average annual build rate (479 housing units per year) than the previous 10 year period (416 housing units per year). Having had regard to the Welsh Government 2011 – base projections and to all relevant factors, including the anticipated and planned for economic growth and deliverability, the Deposit Plan figure of 7,184 new homes is considered to strike the appropriate balance between the evidenced need and the ability to demonstrate deliverability. It is deemed appropriate in the context of available evidence for a number of reasons as set out below:

(i) The base allowance takes account of the continued effects of the prevailing market conditions and out-migration trends. It recognises that the area's economy is still fragile, with relatively low average incomes. It recognises that a sound planning strategy has to be based on what is deliverable. Hence the base allowance during the first half of the Plan period. Therefore, the Plan is appropriate and effective (tests of soundness 2 & 3), - it reflects the evidence, e.g. Joint Housing Land Availability Studies.

(ii) It is assumed that the economy and the housing market gradually recover to at least pre-recession performance. Therefore, the Plan is appropriate and effective (tests of soundness 2 & 3), - it reflects the evidence, e.g. Joint Housing Land Availability Studies.

(iii) It takes account of the short- and long-term employment, with resulting temporary and permanent housing needs arising from construction and operation of the proposed new nuclear power station. Policies then facilitate different elements of the accommodation requirements of the workforce: permanent housing for workers on relatively long term contracts who might move into parts of the Plan area; temporary 'campus' accommodation for several years, e.g. when construction is at its most intense and/ or earlier on to allow local communities to deal with the changes; short term caravan or similar accommodation; permanent housing for the power station operational workforce, - demand for which will be in the later stages of the Plan period. Therefore, the Plan is appropriate, - it reflects the evidence (test of soundness 2);

(iv) As set out in their Strategic Plans, both Councils have ambitions for sustainable economic growth and improved prosperity, seeking to maximise the economic

benefits that construction of the new nuclear power station will bring, as well as economic benefits that will be created from the construction and operation phases of the proposed National Grid North Wales Connections Project; MSparc, Science Park, Gaerwen; Orthius EcoPark, Holyhead; Land and Lakes Ltd., Holyhead – tourism and leisure village; Vibrant and Viable Places regeneration funding – Holyhead and Caernarfon; Bangor University and Coleg Menai's proposal to expand their campuses, (this list isn't exhaustive) which together will transform the local economy during the mid and later years of the Plan period. Therefore the Plan fits and it is appropriate, as it relates well to the Single Integrated Plan, it is consistent with relevant high level plans and strategies and reflects the evidence (tests of soundness 1 & 2);

(v) Economic ambition and opportunities will help retain working age households that have previously left the Plan area and will help attract those that have moved away and other economic migrants. Therefore the Plan is appropriate, - it reflects the evidence (test of soundness 2);

(vi) Wales Spatial Plan identifies recognises the importance of a cluster of larger towns located either side of the Menai Straits (referred to as the Menai hub) as a strong focal point for economic activity in the North West Wales zone. It also seeks to maximise the opportunities of Holyhead as a major international gateway. Also recognised is the Penrhyndeudraeth - Porthmadog – Pwllheli hub of growth centres, with a focus on providing services and employment and building on established strengths to support and spread prosperity. The vision for this Zone seeks to ensure that opportunities continue to be realised and are able to benefit those living in the area. Therefore the Plan fits and it is appropriate, as it relates well to the Wales Spatial Plan, and reflects the evidence (tests of soundness 1 & 2);

(vii) Anglesey and Gwynedd Single Integrated Plan (SIP), like their predecessors, seeks to facilitate changes that would make both Counties a healthy, safe and prosperous place to live and work. By facilitating development in a way that helps tackle the SIP's priorities the Plan fits (test of soundness 1)

(viii) The level of growth meets the Minister's advice to avoid replicating a period of poor growth, therefore the Plan fits (test of soundness 1);

(ix) The level of growth is required in order to address the Plan's key issues and achieve its Vision and Objectives – therefore the Plan is appropriate (test of soundness 2).

3.27 The housing supply, i.e. 7,902, has been set at a higher level that the Plan requirement. This equates to a 10% slippage allowance. The Councils consider that it is appropriate to have a higher supply as it will provide some flexibility to address the defined housing requirement, e.g. address the possibility of some housing allocations delivering less than the standard 30 housing units per hectare. The housing supply figure is set out in Policy PS 13 in the Deposit Plan. It reflects the period when it is anticipated that the 'market uplift' described above will happen, i.e. during 2018 – 2019.

3.28 Therefore, the Councils consider that adequate regard has been paid to the Welsh Government household and population projections.

3c	**Has the requirement figure been informed by a robust assessment of the main local influences on housing demand, including: household formation, migration, and household conversion ratios.**

3.29 **Response** – Yes. The Councils have looked at factors that influence change at the local level on housing demand in the Plan area in order to provide evidence for growth. The evidence is set out in a number of Topic and Background Papers, which include Topic Paper 3A Population and Housing (PT.006), background documents that explain the difference between the Welsh Government 2008 – based and 2011 – based projections (DC.017 and DC.018) and Population and Household projections – assumptions, methodology and scenario results (DC.016).

3.30 Household formation – the evidence shows that the difference between the 2008-based and the 2011-based projections is partly due to the difference between predicted and observed household size at 2011. Average household size was larger than expected, so fewer households were forming than past trends had predicted. The rate of change in average household size has been falling since records began. However, after many decades of an almost linear decline, between 2001 and 2011 the speed of the downward trend reduced considerably. This means fewer households were formed than was predicted by the 2008 projections – that is, average household size was larger than expected, so fewer households were forming than past trends had forecast. Chart 4 in background paper (DC.017) shows the extent of the change in the linear trend which the 2008-based projections had continued. 2011 data shows a distinct slow down in the rate of change.

3.31 The 2007/ 2008 economic downturn, whose effect is continuing to be felt in the Plan area has contributed to the slowdown in household formation. Fewer young people are leaving the family home and forming their own households. This is often because they can't afford to do so, as house prices (both to buy and rent) have increased so much in the past 10-15 years. More of the young people who do leave the parental home are sharing with other non-related adults rather than setting up their own homes. The 2011 Census records that a number of households in Gwynedd and Anglesey, respectively, have non-dependent young adults living in them: The 2011 Census shows that 16% of single households in Gwynedd and 17% on Anglesey include non-student young adults. Fewer people are living alone or in small households after family break up. It is reasonable to consider that they are either sharing with other, unrelated adults, or are moving back to the parental home. As a consequence, growth rates in one person and lone parent households were much slower between 2001-2011 than between 1991 and 2001. This slow down in household formation is unlikely to change without improved economic prospects, coupled with policies that seek to maximise affordable housing provision and an appropriate mix of house types.

3.32 Migration – this is a very volatile component of population change and can fluctuate significantly from year to year. The 2008-based projections took a trend from 2003/04, which, with the exception of the first year, was a period of particularly low net migration for Gwynedd. The average annual migration for the 5 year period as used in the projections was +251.The new 2011-based principal projection is based on a five year migration trend and looks at the period from 2006/07 to 2010/11. The

average annual migration for the 5 year period was +387. The 2011-based 10 year trend projection took a longer period, which evened out some of the peaks and troughs seen over the shorter periods. The average annual migration for the 10 year period was +458 (Explaining the difference between the 2008- based and 2011 – based projections DC.017).

3.33 The new 2011-based principal projection is based on a five year migration trend and looks at the period from 2006/07 to 2010/11 – four of the five years within that period were years of economic slowdown which led to much lower levels of migration than had been seen in previous years. For three of these years Anglesey saw net out-migration (more people leaving the Island than moving to live there). The average annual migration for the 5 year period was +40. 2008-based projections took a trend from 2003/04, which was still mostly a period of economic migration expansion, after the accession of the A8 countries to the European Economic Union. The average annual migration for the 5 year period was +206 – more than 5 times higher than the 2011-based figure. The 2011-based 10 year trend projection took a longer period, which led to an average trend that was somewhere between the high levels of migration seen in 2003/04-2007/08 and the slump in migration seen between 2006/07-2010/11, as it evened out some of the peaks and troughs seen over the shorter period. The average annual migration for the 10 year period was +165. (Explaining the difference between the 2008- based and 2011 – based projections DC.018)

3.34 The above shows how great the variation can be for a selected period. It is virtually impossible to accurately predict future migration trends. Migration is driven by many things outside of the Councils' powers to control or forecast (the recent economic downturn, the expansion of the EU, housing market booms or busts). The volatility of the migration element of population change highlights the limitations of using trend based projections in isolation of other data.

3.35 As set out in the background document that explains the difference between the Welsh Government 2008 – based and 2011 – based projections (DC.017), in Gwynedd, the presence of the university in Bangor is the biggest single driver of migration into and out of the County. Without the University, in-migration would be mostly driven by the older age groups who were retiring to the area. If the scale of this retirement-related in-migration did not balance out the out-migration of young adults, then the total population of the area would start to fall. Over time, the age profile of Gwynedd would be skewed towards the older age groups. The table at paragraph 4.4 of Topic Paper 3A (PT.007) anticipates that international migration as opposed to internal (UK) migration will account for change in the Plan area. It is likely that this is linked to the student population in Bangor.

3.36 Appendix B of background paper "Population and Household Projections – assumptions, methodology and scenario results" (DC.015) explains how information about internal and international migration has been used in the alternative scenarios that were examined.

3.37 Household conversion ratios - The relationship between households and dwellings used in relation to the various alternative growth scenarios examined is modelled using a 'vacancy rate', sourced from the 2011 Census. The vacancy rate includes second homes and holiday lets. The vacancy rate is calculated by dividing the number of places in occupied households (table KS401) with the total number of houses (QS418). In the case of part of the Plan area that is within the Gwynedd Planning Authority, it was necessary to exclude parts of Gwynedd county that are,

inside the Snowdonia National Park (SNP). The total statistics for the Census Output Areas that are not within the SNP were used.

3.38 Empty spaces in households and households that are used as second homes are described in the Census as 'places in households without regular residents'. Because there are many holiday homes and second homes in Anglesey and Gwynedd, the vacancy rates are higher than places that have fewer households of this type. The conversion rates applied in the growth scenarios are considered to align best with local circumstances. The rates are as follows:

- Gwynedd = 12.2%
- Anglesey = 10.5%

4 Are the Housing Supply calculations set out in Policies TAI14 - 17 (as amended by NF77 & 78) appropriate?

4.1 **Response -** The figures within the Policies are accurate however it is acknowledged that the explanation over how we have reached these figures is not clearly set out within the Plan.

4a Are the figures in TAI 14 - 17 sufficiently up to date and accurate?

4.2 **Response -** The figures contained within the Plan reflect the position in 2014 when we were preparing the Plan and going through the Committee process to seek a resolution to undertake a public consultation exercise on the Deposit Plan.

4.3 It is accepted that the indicative growth figure for each settlement outlined within Topic Paper 5A Developing the Settlement Hierarchy (PT.012) is not clearly set out for the different Service Centres within policies TAI14 to TAI16. In addition the Explanatory Note – Facilitating Affordable Housing (DA014b) used updated April 2015 figures to justify the affordable housing figure within the Plan. In light of this it is felt appropriate to provide updated information regarding each settlements indicative growth level, completions to date (2011 to 2015), the windfall land bank anticipated to be built (April 2015), growth anticipated through allocated sites (April 2015) as well as further windfall provision required to achieve the anticipated growth level. Appendix 1 to this statement shows this breakdown per individual settlement.

4.4 In addition tables 18 and 19 of the Deposit plan have been updated as shown below to reflect the 2015 position per category of settlements in both Anglesey and Gwynedd.

Table 18 - Position since Base Date of the Plan in 2011 – Ynys Môn (2015 figures)

Type of Settlements	Number of Settlements	Units Required	Units Completed	Units with planning permission[1]	Additional number required
Urban Service Centres	**3**	**2,039**	**179**	**500**	**1,360**

Type of Settlements	Number of Settlements	Units Required	Units Completed	Units with planning permission[1]	Additional number required
Local Service Centres	**10**	**790**	**171**	**226**	**393**
Service Villages	**3**	**120**	**6**	**52**	**62**
Villages	**30**	**616**	**117**	**264**	**235**
Clusters	**51**	**102**	**57**	**111**	**-66**
Open Countryside	**-**	**150**	**112**	**236**	**-198**
TOTALS	**97**	**3,817**	**642**	**1,389**	**1,786**

[1] This figure does not include sites unlikely to be completed within the Plan Period.

Table 19 - Position since Base Date of the Plan in 2011 – Gwynedd (2015 figures)

Type of Settlements	Number of Settlements	Units Required	Units Completed	Units with planning permission[1]	Additional number required
Sub-regional Centre & Urban Service Centres	**5**	**2,306**	**309**	**715**	**1,282**
Local Service Centres	**10**	**790**	**137**	**413**	**240**
Service Villages	**8**	**320**	**24**	**104**	**192**
Villages	**46**	**446**	**191**	**188**	**67**
Clusters	**61**	**122**	**21**	**30**	**71**
Open Countryside	**-**	**100**	**24**	**41**	**35**
TOTALS	**130**	**4,084**	**706**	**1,491**	**1,887**

[1] This figure does not include sites unlikely to be completed within the Plan Period.

4.5 It should be noted that for ten settlements the actual level of growth achieved through completions has exceeded the indicative growth level. This scenario could also be applicable for more settlements when their land bank is completed. This is a reflection of the current permissive policies that are in place under the current Development Plans. The Plan's monitoring system will be evaluating the housing growth against the spatial strategy: 55% in the Main Centres, 20% in Local Service Centres and 25% in Villages and Clusters as opposed to reporting on the delivery in individual settlements.

4.6 The indicative growth is intended to provide guidance to the different communities as to what the spatial strategy could mean for them. It also informed the supporting Welsh Language Impact Assessment (CDLL.013) and SA Report (CDLL.007). They have evaluated the impact of such level of growth. The reality of the matter is that a range of factors will influence the growth level within the different settlements and some will achieve a level above the indicative level whilst others will be below. Careful consideration will have to be given to those settlements which have already exceeded the indicative growth level this early into the Plan period to ensure that any further growth does not have an unacceptable impact in terms of social or environmental issues.

4b	**Will the Plan provide a 5 year supply of housing for the duration of the Plan?**

4.7 **Response -** Yes. Topic Paper 20A Housing Trajectory (DA.023) shows the breakdown of the allocated sites, existing land bank and additional windfall required to deliver the Plan's growth rate (including the 10% slippage allowance). This Paper demonstrates that, based upon the split target periods in policy PS13 to reflect the anticipated upturn in growth linked to the major infrastructure project, a 5 year land supply can be maintained throughout the Plan period.

4c	**Are all the site allocations available and deliverable within anticipated timescale? Are the allocations supported by a robust and comprehensive site assessment methodology, free of significant development constraints and demonstrated to be economically viable and deliverable?**

4.8 **Response -** Yes. The sites selected/ allocated within the Deposit Plan, as amended by Focus Changes, have been subject to robust and comprehensive assessments. In preparing the Plan, the Councils have taken a significant number of sites into consideration, i.e. sites submitted as Candidate Sites, sites allocated in existing plans that currently remain undeveloped, and sites suggested in inter Service discussions. Whilst the assessment was not designed to produce detailed technical information on a site by site basis, the process did provide a comprehensive overview of the development potential of sites and was based on the best available information at the time of Plan preparation.

4.9 The selection of housing sites and the justification for the decisions taken between the competing alternatives is set out in Topic Paper 1 and Topic Paper 1A the Candidate Site Assessment Report (PT.001 and PT002). The assessment enabled the Councils to determine which sites are capable of development and can contribute to the delivery of the Strategy, i.e. their 'suitability' and 'deliverability' over the Plan period. The assessment process included extensive consultation with internal Council departments and statutory consultees to identify any site constraints. An

overview of the information is provided against each site in Topic Paper 1A and 1B (PT.002 and PT.003).

4.10 The Councils have prepared a Site Deliverability Report (2016) (DA015) in response to questions raised regarding the deliverability of sites allocated for development within the Joint Local Development Plan (JLDP) on viability grounds due to the requirements for infrastructure, facilities and services to support the level of growth proposed in the JLDP, and the implications that this could have on the delivery of the Plan.

4.11 Appendix 1 of the Site Deliverability Report provides details of site specific infrastructure requirements for each JLDP housing allocation. As stated in paragraph 2.6 of this Deliverability Report the final infrastructure requirements that may be required for development proposals associated with site allocations within the JLDP will be determined on an individual basis through the development management system, and secured through planning conditions or Section 106 agreements, in order to ensure that those proposals are acceptable in planning terms. The Affordable Housing Viability Study (DC.001) allows for £5,000 per unit to cover on average all contributions other than affordable housing. Topic Paper 13 (PT.024) groups the infrastructure into three categories. In the Observations Report – Representations about Focus Change (CDLL.029) in relation to NF20 the Councils have suggested additional amendments to paragraph 7.1.10 of the Deposit Plan. If deemed acceptable and appropriate by the Inspector the Councils would like to propose that the suggested amendment to NF20 in relation to reference to Topic Paper 13 as outlined below be addressed via Matters Arising Changes:

7.1.10 New development will often require new or rely on existing infrastructure, services and facilities to make proposals acceptable in land use planning terms. **The list included in the Policy is not intended to be exhaustive or limiting, but it gives an indication of the potential scope of infrastructure which may be required. Statutory** ~~community~~ benefits, related to proposed development and necessary for the grant of planning permission, can be sought from developers providing they **meet the meet the tests in the Community Infrastructure Levy Regulations 2010 as set out in paragraph 7.1.6** ~~are fairly and reasonably related in scale and in kind to the proposal.~~ **Topic Paper 13 on Community infrastructure differentiates between fundamental, necessary and community** ~~**essential and preferred**~~ **infrastructure.** It is important that the provision of infrastructure for a development site is located and designed in such a way as to minimise the impact on the natural and built environment. The amenities of local residents should also be protected. Statutory Benefits ~~community infrastructure contributions~~ will be secured either through ~~planning~~ **Section 106** obligations ~~as set out in~~ **under** the Town and Country Planning Act 1990, **as planning permission conditions** or, **in the event a CIL charging regime is introduced by the Councils,** through ~~levy~~ CIL receipts under the Community Infrastructure Levy Regulations 2010.

Where the deliverability of a development may be compromised by the scale of planning obligations and other costs, a viability assessment may be necessary. This should be informed by the particular circumstances of the site and proposed development in question. Assessing the viability of a particular site requires more detailed analysis than at plan level.

4d	**Is the estimated yield of units from committed sites and windfall sites realistic, based on the available evidence?**

4.12 **Response -** Yes. Topic Paper 6 Urban Capacity Study (2015) (PT.013) establishes the capacity of the Sub-Regional Centre, Urban Service Centres and Local Service Centres within the Joint Local Development Plan area, to provide new residential units during the Plan's lifetime. This is a means of establishing the potential for developing extra housing within the Centres, without requiring new allocations. This approach is in line with paragraph 9.2.8 of Planning Policy Wales (PPW) (Jan 16 Edition 8) (PC009) which refers to a search sequence approach for identifying sites to be allocated for housing starting with the re-use of previously developed land and buildings within settlements. This is reiterated within the first bullet point under paragraph 4.4.3 of (PPW).

4.13 Table 1 within Topic Paper 6 outlines the Site Categories that were subject to the fieldwork survey that identified potential sites. In addition Chapters 6 and 7 of the Urban Capacity Study undertook an assessment of potential residential supply that could not be assessed by means of fieldwork survey e.g. residential units above shops, converting commercial buildings, bringing empty homes back into use etc. This is based upon the approach outlined within 'Housing Land Availability assessments: Identifying appropriate land for housing development' (ODPM) (Dec 2005). The method for gathering this information was to review historic planning permissions within each centre assessed against potential future supply of registered commercial buildings and retail studies undertaken within the Centres.

4.14 Chapter 8 of the Topic Paper 5A Developing the Settlement Hierarchy (2016) (PT.012) does state in relation to the Urban Capacity study that the housing supply includes a 10% slippage allowance, in part to include a level of flexibility to address any potential reduced rate of reuse of properties and sites. In addition it is considered that a cautious approach should be taken in terms of the dependency on windfall sites. Therefore, for the purposes of this Plan, a more conservative estimate of windfall sites was taken for the majority of Centres, where only 75% of the Urban Capacity figures has been used to contribute to the housing supply. However for Centres with a high level of constraints e.g. due to flood risk a higher proportion of the Urban Capacity figures has been used against the settlements' growth figure provided the potential sites fall outside the constrained area. The Plan's monitoring framework will assess the success or otherwise of this approach.

4.15 The historic contribution of windfall provision within the Plan area to the housing supply can also be seen in the level of completions on small sites (below 5 units) recorded. These would all be windfall sites recorded within historic Joint Housing Land Availability Studies (JHLAS) for both Gwynedd and Anglesey. The table below shows the % of growth seen on small sites in both Anglesey and Gwynedd Planning Area over the past ten years as compared with the overall completion in each planning area:

Table 4 – Percentage of overall Completions seen on Small Sites (below 5 units) in both Gwynedd Planning Area and Anglesey in JHLAS Studies from 2005 to 2015

Year of Study	Gwynedd Planning Area Small Sites Completion (%)	Anglesey Small Sites Completion (%)
2007*	66.4%	39.7%
2008	47.6%	45%
2009	69.5%	40.2%
2010	48.3%	53.8%
2011	40.7%	44.1%
2012	38.8%	62.2%

Year of Study	Gwynedd Planning Area Small Sites Completion (%)	Anglesey Small Sites Completion (%)
2013	46.2%	39.5%
2014	36.9%	50.3%
2015	31.5%	68.3%

* It was only in 2008 that the JHLAS became an annual requirement prior to this it was conducted on a biennial basis therefore the 2007 figures was for the period 2005 to 2007.

4.16 The level of growth seen on small sites equates to on average 95.7 units per annum on Anglesey and 87.8 units per annum in the Gwynedd Planning Area. It must be realised that in addition to the small sites which would all be windfall sites, some of the growth seen on large sites (5 or more units) would also be on windfall sites.

4.17 Table 3 in Appendix 5 of the Deposit Plan (CDLL.004) identifies a number of units from the existing land bank that the Councils feel are unlikely to the developed through the Plan period: 83 units in the Gwynedd Planning Area and 599 units on Anglesey.

4.18 The Councils are therefore confident that the anticipated growth from committed sites and windfall provision is realistic based upon the methodology and evaluation of evidence from the Urban Capacity Study as well as the historic past rate of development identified in the JHLAS.

4e Is the Plan's approach to phasing of delivery appropriate? How would the anticipated rate of delivery be facilitated in practice?

4.19 **Response** – Yes. Planning Policy Wales at paragraph 2.28 sets out the possibility that circumstances in a plan area may justify an approach whereby particular sites cannot be released for development until a particular stage in the Plan period. However, it states that "where phasing is included in an LDP it should take the form of a broad indication of the timescale envisaged for the release of the main development areas or identified sites, rather than an arbitrary numerical limit on permissions or a precise order of release of sites in particular periods."

4.20 The Plan does not include a policy that seeks to control the way in which permissions are released in order to ensure delivery.

4.21 Policy PS 13 (as amended by Focus Change NF 61) describes the level of housing anticipated to be delivered at different stages during the Plan period, reflecting the formula described above to identify the level of housing growth and incorporates the 10% slippage allowance. This is not about x number of units being allowed in the first 7 years of the Plan period and y units being allowed in the following 8 years.

4.22 Policy TAI 1 and new Policy TAI X recognises that there may be cases where it may be necessary to ensure that development on individual sites does not come forward at a rate greater than that which a settlement can absorb. Policy TAI X was introduced via a Focus Change (NF62). Following consideration of representations made about Focus Changes, amendments have been suggested as set out in "Observations report – representations about Focus Changes" (CDLL.029), which

seeks to clarify the Policy's purpose. The suggested amendments seek to demonstrate the scenarios when it would be reasonable to apply the criteria in the Policy, e.g. to manage the effect of development on a settlement.

4.23 Granting permission subject to a planning mechanism that manages the rate would ensure that potential impacts on existing communities, including its linguistic character, are minimised. Phasing may also be required to manage the rate of delivery in respect of physical infrastructure, e.g. waste water treatment.

4.24 Topic Paper 20A Housing Trajectory (DA.023) provides an indication of the anticipated rate of delivery on individual allocated sites, sites with existing planning consent, and windfall sites. The anticipated trajectory/ delivery is based on the best available evidence. It anticipates the 'uplift' that will happen post 2018, reflecting the anticipated development of Wylfa Newydd and other locally significant employment development (as described in response to question 3b above).

4.25 The "Site Delivery Report" (July 2016) (DA.015) recognises the range of influences, both policy and infrastructure, that are likely to impact on site delivery.

4.26 The Plan, therefore, isn't prescriptive. It provides flexibility and choice and will respond to changes in circumstances, e.g. delivery of infrastructure ahead of schedule.

4.27 As described in response to question 6 below, the Plan will be underpinned by a robust Monitoring Framework, which will be used to monitor delivery of housing on an annual basis. The monitoring work will be informed by the annual Joint Housing Land Availability Studies undertaken by both Councils.

4.28 The Councils are therefore confident that the approach to phasing of delivery appropriate.

4f Are the proposed completions rates realistic? What are the implications of failing to deliver the required amount of housing?

4.29 The average annual completion rate for the period 2011 to 2015 has been 337 units per annum (pa) which compares with the anticipated level of 339 units pa for the period 2011 to 2018 (based on the growth figure without the slippage allowance - it would be 372 units pa with the 10% slippage allowance).

4.30 It is considered that the economic upturn anticipated from major infrastructure proposals as well as the Anglesey Enterprise Zone status will lead to greater demand and need for housing within the Plan area. An adopted JLDP would provide sufficient certainty to ensure development sites can progress in line with the level of completions set out within the Councils Housing trajectory update and addendum Topic Paper 20A (DA.023).

4.31 The Indicators identified within the Draft Amended Monitoring Framework (DA.010c) provides a robust monitoring framework which will be used to monitor delivery of housing on an annual basis. The monitoring work will be informed by the annual JHLAS undertaken by both Authorities. If housing targets are not being reached, this will trigger further investigation and ultimately a partial or full Plan review of the JLDP if necessary.

4g	Does the 10% slippage allowance provide sufficient flexibility in the event of sites not coming forward as anticipated?

4.32 **Response** – Planning Policy Wales in section 9 is clear in promoting the efficient use of land and buildings and one of the ways this can be achieved is through appropriate densities in developments. In order to calculate the potential yield from each site considered at the candidate sites stage and to inform the Urban Capacity Study a historic density rate of 30 unit per hectare was applied. The housing unit figures produced for each site as a result of this calculation are indicative only. It will be for the planning process to make the final decisions on the appropriate development density, responding to the individual site characteristics and the locality.

4.33 It would be unreasonable not to include slippage allowance because to do so would suggest that all sites everywhere would produce just 30 units per hectare. There may be some sites and areas where higher than 30 housing units per hectare is appropriate and there may be areas where a lower density are appropriate. Criterion 4 of Policy PCYFF 1 of the Plan supports development that will make the most effective use of land, referring to achieving a minimum density of 30 units per hectare unless there are local circumstances or site constraints that indicate otherwise. Therefore, the Policy guides density rather than prescribes density. The tests of soundness require local development plans to be reasonably flexible to enable them to deal with changing circumstances.

4.34 In deciding the right level of additional land required to address the housing requirement should flexibility be needed to allow for a lower than 30 units per hectare density, non-delivery of sites and unforeseen circumstances, the Councils explored the approach taken by other Councils. Generally, it was found that a 10% slippage allowance was applied to address the housing requirement. It was also found that Welsh Government in principle is generally supportive to this type of level.

4.35 The Councils therefore applied a 10% slippage allowance to the overall housing requirement of 7,184 over the plan period. Therefore, in order to facilitate the delivery of the overall housing requirement, the Plan provides a housing land supply that equates to 7,902 (based on a standard 30 unit per hectare density). The adopted Plan will be underpinned by a robust Monitoring Framework, which will be used to monitor implementation of the Plan's policies and proposals. This will feed directly into the Annual Monitoring Report and, in turn, be used to inform decisions about amendments to policies (if required) and future reviews of the Plan.

4.36 The Councils therefore consider that the 10% slippage allowance provide sufficient flexibility in the event of sites not coming forward as anticipated.

5	In relation to other specific types of housing provision:

5a	Is there justification for limiting new housing in the lower tier settlements to meeting only 'community need' or affordable housing? Would the policy serve its intended purpose? How would it work in practice?

5.1 **Response -** Yes. Policy TAI 17 in the Plan which is relevant to Local, Rural and Coastal Villages refer to housing having to satisfy a community need for housing or be for local need affordable housing. In addition policy Tai 18 in relation to Clusters only supports affordable housing. Therefore these are the type of settlements subject to consideration under this question.

5.2 Appendix 4 Schedule of Settlements in the Deposit Plan (CDLL.004) summarises the function of different categories of settlements and implications for such categories within the Plan. The full methodology for the categorisation of settlements can be seen in Topic Paper 5A Developing the Settlement Strategy (2015) (PT.012).

5.3 Table 10 within Topic Paper 5A identifies the Criteria applied to categorise Settlements. Every Village has at least one of the identified Key Services and a limited number of other services that serve the settlement and lower level Clusters in its immediate vicinity. Clusters are a distinct group of at least 10 or more dwellings located on a bus route or within 800m to a bus stop.

5.4 Table 12 within Topic Paper 5A highlights the type of development expected within the different categories of settlements. In relation to Local, Rural and Coastal Villages it states to reflect the character of Local and Coastal / Rural Villages, housing development will be limited to a scale and type to address community need for housing. More limited development will take place in these Villages to protect their character, support community need for housing or for local need affordable housing. For Clusters it states: "Over the Plan period there will be no allocation for development within the named Clusters. Local need affordable housing units will be permitted on infill or extension plots in acceptable and sustainable locations."

5.5 All of this reflects the type and range of services and facilities identified in such settlements as set out in Appendix 2 tables A & B within Topic Paper 5A. Chapter 2 of Topic Paper 5A identifies the local Characteristics of the area. This shows the challenge of dealing with the historical nature of rural communities throughout the area against National policies of sustainable development and reducing the need to travel.

5.6 To ensure that the Plan does not have a detrimental impact upon the rural areas indicative limited growth has been given to Local, Rural and Coastal Villages, however to reflect the limited amount of facilities within such centres, prevent development catering for second homes and to allow for an organic growth from the community itself the Plan seeks to limit development to community need for housing within such locations. Furthermore in relation to Clusters due to even less facilities being present within them development within these is limited to only affordable housing. The limited amount of affordable housing provision currently seen within the majority of Local, Rural and Coastal Villages as well as within Clusters mean's that having more affordable housing within these settlements will assist in creating a more balanced community.

5.7 This approach will contribute to ensuring that settlements are not overwhelmed by growth and provide an opportunity for householders to stay in their community and thereby retain the existing linguistic balance seen within such settlements. Settlement boundaries have been drawn to facilitate infill and minor extensions and /or rural exception sites.

5.8 It would mean that evidence would have to be provided with applications over how the proposal would satisfy the community need for housing. This would normally

mean that the application was submitted by the end user or supporting evidence that there is a need in the community for the type of property(ies) being proposed. The SPG Scope & Draft Timetable (DA010b) provides a summary of the content of the various Supplementary Planning Guidance (SPG) documents that will be supporting the Plan. The SPG 'Maintenance and creation of distinctive and sustainable communities' would provide guidance in relation to the type of information required to support development in the lower tier settlements.

5b Is there a justification for the exception set out in criterion 1.of TAI2 (two storey terraced houses)?

i Will it unduly inhibit the provision of a local mix of housing in areas where there may be a demand for smaller homes?

5.9 Paragraph 7.4.14 of the Explanation to Policy TAI 2 in the Deposit Plan (CDLL.004) outlines the Councils' concerns over the impact on the amenity of adjacent users when small two storey terraced houses are converted into HMOs. This could lead to two storey properties occupied by more people than designed for. This can be seen within Bangor due to the large student population and the increase usage over the years of residential properties especially two storey terraced housing in Hirael Ward and along Caernarfon Road in the Dewi Ward.

5.10 It is felt that there are sufficient opportunities through the conversion of larger buildings within the Main Centres in the Plan area to deliver purpose build flats or HMOs as can be seen with a number of recent developments seen in Bangor.

ii Is it the most effective way of addressing any perceived pressure on the housing stock?

5.11 It is not specifically seen as the most effective way of addressing any perceived pressure but rather as the response to question 5b(i) above explains it is to due to the impact upon the amenity of adjacent users that the Councils seek to stop the sub-division of two storey terraced houses.

5c Will Policy TAI 3 serve its intended purpose with regard to managing the effect of temporary construction workers on the future stock of housing?

5.12 **Response** – Yes. Delivery of Wylfa Newydd will depend on a number of 'associated developments' that will not be located on the main development area. These associated developments include provision of accommodation for the thousands of temporary construction workers required to build the power station and its ancillary buildings.

5.13 According to Horizon Nuclear Power's Project Update published in January 2016 (DC.027), it was anticipated that the Project will attract both permanent and temporary workers for an extended period:

- total peak construction workforce employment - approximately 8,500 -10,000
- permanent operations workforce of circa 850 FTEs

- temporary outage workforce of circa 1,000 FTEs every 18 months during operations.

5.14 In terms of accommodation for workers, the impact on housing provision in the Plan area will be threefold:

- the power station will provide a major boost to the resident workforce in the Plan area and beyond (90 minute drive time);
- some workers will settle temporarily for varying periods of time in the Plan area, particularly Anglesey and north Gwynedd. They will use a variety of solutions ranging from using latent supply in existing residential properties, bed and breakfast, through to those who may settle here in the short term and buy or rent property;
- other workers will be accommodated in temporary 'campus' style accommodation.

5.15 Both Horizon Nuclear Power and the Councils are keen to ensure that the solution avoids adverse socio-economic effects in respect of the housing market and minimises adverse effects on the local communities, including the Welsh language. The Construction Workers Accommodation Strategy prepared by Horizon Nuclear Power identifies a range of solutions to addressing the need for a substantial amount of bedspaces during the construction period, which includes temporary modular build workers' accommodation.

5.16 The Isle of Anglesey County Council's current Position Statement regarding accommodation for construction workers, which is based on the "Wylfa Nuclear New Build: Accommodation facilities for construction workers study (2011)", also favours purpose build accommodation as one of the options to address the need. Based on the information to hand at that time the Council favoured three delivery options, including that:

"30% of workers accommodated in purpose built accommodation (a minimum on-site to meet operational requirements but the majority off-site)"

5.17 The Council is currently reviewing the information provided by Horizon Nuclear Power regarding the number of construction workers now anticipated to be required to deliver the Project. Whilst the total number of workers may have increased than what was initially (2011) anticipated purpose built modular accommodation is still considered to be an important provision.

5.18 Therefore, both parties agree that the provision of temporary accommodation for a proportion of the construction workers forms part of the solution.

5.19 Policy PS 9 of the Deposit Plan, as amended by Focus Change 43, sets out the Councils' expectations in terms of several elements of the Project, including accommodation for construction workers. Criterion 4 in Policy PS 9 sets out the expectation for an accommodation strategy, and criterion 5 sets out the expectation to consider potential legacy uses, where possible, at the design stage.

5.20 Policy TAI 3 is therefore the principle policy that sets out the detailed criteria that would be used to determine a planning application for a proposal involving temporary construction workers' accommodation. Its criteria align with the Plan's Spatial Strategy, setting out a sequential approach to site selection. It also aligns with Policy

PS 9 in that it seeks consideration of potential legacy uses post construction phase, where possible, requiring the legacy use to be policy compliant. The Policy in its pre-Focus Changes form prevented the use of housing allocations. Focus Change NF 64 removes this criterion on the basis that its inclusion could be at odds with the Policy's sequential approach to site selection. However, criterion 3 is retained, and requires that a proposal does not prejudice the Council's ability to sustain a 5 years' land supply of housing. Therefore, the amended Policy provides an element of flexibility that could facilitate a suitable proposal on a housing allocation provided that the temporary buildings are removed from the site in a timely manner leaving a development ready site, or, the buildings' use by construction workers would end and the buildings could be adapted to provide permanent residential use within the Plan period.

5.21 Therefore, by facilitating temporary accommodation for construction workers, it is considered that Policy TAI 3 contributes to managing the effect of an influx of a considerable number of workers on the current and future stock of housing.

5.22 Nonetheless, the Councils consider that some minor changes to clarify the scope of Policy TAI 3 would be beneficial. The proposed amendments are set out in more detail in the Statement of Common Ground between the Isle of Anglesey County Council and Horizon, which can be seen in documentation published for Hearing 9 Wylfa Newydd.

6	**Does the Plan provide a sound basis for implementation and monitoring of housing provision?**

6a	**Does the Plan incorporate robust monitoring and review mechanisms that will enable the housing strategy to respond effectively to changing circumstances?**

6.1 **Response** - The Plan is considered to be sufficiently flexible to respond to changing conditions. The amount of housing (and employment land) required will be kept under review in the Annual Monitoring Report (AMR). The AMR forms the basis on which to assess the effectiveness of the Plan's policies and proposals. Key indicators will be closely monitored throughout the Plan period to ensure the strategy is meeting its intended targets and its proposals are delivered within the anticipated timeframes.

6.2 The AMR will also analyse the effectiveness and continued relevance of the Plan's policies in the light of circumstantial changes. Monitoring will enable the Councils to record any deviation from anticipated rates. If it appears that the targets are not being reached, or that there is a significant circumstantial change, it will be necessary to deal with this through a partial or full review.

6.3 Chapter 8 of the Plan includes a Monitoring Framework, which was subject to Focus Changes (CDLL.023). In response to the Inspector's preliminary note to the Councils in May 2016 (DA.002), the Monitoring Framework's presentation was refined and presented to the Examination (DA.010c). The Councils are prepared to make additional necessary changes to the Framework to ensure it is always a forward looking process to monitor the Plan's effectiveness, incorporating a commitment to take action if development does not come forward as expected and identify measures to be undertaken to address any changes.

7 Any other matters

APPENDIX 1 - Position of Settlements April 2015

Table 1 – Main centres - Gwynedd

Settlement	Indicative Growth Level (a)	Units Completed (2011-15) (b)	Windfall Sites Landbank (April 2015) (c)	Housing Allocations		Expected growth level of new windfall sites (dd) = (a) – [(b)+(c)+(ch)+(d)]
				With Planning Permission (April 15) (ch)	Without Planning Permission (April 15) (d)	
Bangor	969	211	180	218	148	212
Caernarfon	415	41	59	132**	71	112
Pwllheli	323	45	37	0	181	60
Porthmadog	128* (-173)	5	87	0	0	36
Blaenau Ffestiniog	298	7	15	0	155	121
TOTAL	2,133 (-173)	309	378	337	555	554

* 301 was the expected growth level for Porthmadog. However due to the threat of flooding in most of the town, it can only accommodate a 128 units. The remaining units have been distributed to Local Service Centres in the nearby area, namely Criccieth and Penrhyndeudraeth.

** Site T28 with permission for 136 units but only 123 have been noted in the policy. In April 2015, 4 units on the site had been completed. For the purpose of this work, the figure of the 132 units that remain on the site has been used.

Table 2 – Main Centres – Anglesey

Settlement	Indicative Growth Level (a)	Units Completed (2011-15) (b)	Windfall Sites Landbank (April 2015) (c)	Housing Allocations		Expected growth level of new windfall sites (dd) = (a) – [(b)+(c)+(ch)+(d)]
				With Planning Permission (April 15) (ch)	Without Planning Permission (April 15) (d)	
Amlwch	533	22	53	0	373	85
Holyhead	833	100	142	256	174	161
Llangefni	673	57	49	0	485	82
TOTAL	2,039	179	244	256	1032	328

Table 3 – Local Service Centres – Gwynedd

Settlement	Indicative Growth Level (a)	Units Completed (2011-15) (b)	Windfall Sites Landbank (April 2015) (c)	Housing Allocations		Expected growth level of new windfall sites (dd) = (a) – [(b)+(c)+(ch)+(d)]
				With Planning Permission (April 15) (ch)	Without Planning Permission (April 15) (d)	
Abermaw	91	20	57	0	0	14
Abersoch	67	13	54	0	0	0
Bethesda	99	20	49	0	0	30
Criccieth	164 (+96)*	7	64	0	34	59
Llanberis	65 (-5)**	5	1	11	16	32
Llanrug	61	18	18	16	0	9
Nefyn	73	7	22	10	19	15
Penrhyndeudraeth	152 (+84)*	7	22	0	108	15
Penygroes	89	15	10	0	39	25
Tywyn	103	25	44	35	0	-1
TOTAL	964 (+175)	137	341	72	216	198

* Due to the fact that neither Porthmadog nor Tremadog can accommodate their expected growth levels, the additional units have been distributed to Local Service Centres in the nearby area, namely Criccieth and Penrhyndeudraeth

** There is a shorfall of 5 units in Llanberis. The remaining units have been distributed to Deiniolen, which is a Service Village in the nearby area (in order to accommodate this shortfall).

Table 4 – Local Service Centres – Anglesey

Settlement	Indicative Growth Level (a)	Units Completed (2011-15) (b)	Windfall Sites Landbank (April 2015) (c)	Housing Allocations		Expected growth level of new windfall sites (dd) = (a) – [(b)+(c)+(ch)+(d)]
				With Planning Permission (April 15) (ch)	Without Planning Permission (April 15) (d)	
Menai Bridge	115	22	13	56	14	10
Biwmares	96	8	3	35	0	50
Benllech	90	45	25	0	12	8
Valley	84	13	19	0	40	12
Llanfairpwll	82	15	26	10	30	1
Cemaes	81	3	8	0	60	10
Rhosneigr	70	18	14	0	0	38
Gaerwen	58	18	4	0	0	36
Bodedern	57	0	8	0	48	1
Pentraeth	57	29	5	0	0	23
TOTAL	790	171	125	101	204	189

Table 5 – Service Villages – Gwynedd

Settlement	Indicative Growth Level (a)	Units Completed (2011-15) (b)	Windfall Sites Landbank (April 2015) (c)	Housing Allocations		Expected growth level of new windfall sites (dd) = (a) – [(b)+(c)+(ch)+(d)]
				With Planning Permission (April 15) (ch)	Without Planning Permission (April 15) (d)	
Bethel	40	2	2	0	40	-4
Bontnewydd	40	1	3	26	10	0
Botwnnog	40	1	1	0	32	6
Chwilog	40	1	1	15*	20	6
Deiniolen	45 (+5)***	14	4	27**	0	3
Rachub	40	3	6	0	30	1
Tremadog	12 (-28)****	2	10	0	0	0
Y Ffor	40	0	0	9	28	3
TOTAL	297	24	27	77	160	15

* Site T63 with permission for 15 units but 18 units noted in the policy. Therefore for the purpose of this work, have added the 3 additional units to the housing growth figure.
** Site T65 with permission for 27 units but 30 units noted in the policy. Therefore for the purpose of this work, have added the 3 additional units to the growth level figure.
*** Due to the fact that Llanberis cannot accommodate its expected growth level, the additional 5 units have been distributed to Deiniolen, which is a Service Village in the local area.
**** 40 was the expected growth level for Tremadog but due to the threat of flooding in most of the town, it can only accommodate 12 units. The remaining units have been distributed to the Local Service Centre sin the nearby area, namely Criccieth and Penrhyndeudraeth.

Table 6 – Service Villages – Anglesey

Settlement	Indicative Growth Level (a)	Units Completed (2011-15) (b)	Windfall Sites Landbank (April 2015) (c)	Housing Allocations		Expected growth level of new windfall sites (dd) = (a) – [(b)+(c)+(ch)+(d)]
				With Planning Permission (April 15) (ch)	Without Planning Permission (April 15) (d)	
Gwalchmai	40	1	12	0	28	-1
Niwbwrch	40	3	11	12	0	14
Llannerchymedd	40	2	17	0	17	4
TOTAL	120	6	40	12	45	17

Table 7 – Local Villages – Gwynedd

Settlement	Indicative Growth Level (a)	Units Completed (2011-15) (b)	Windfall Sites Landbank (April 2015) (c)	Housing Allocations		Expected growth level of new windfall sites (dd) = (a) – [(b)+(c)+(ch)+(d)]
				With Planning Permission (April 15) (ch)	Without Planning Permission (April 15) (d)	
Abererch	9	1	1	-	-	7
Brynrefail	7	5	0	-	-	2
Caeathro	7	0	12	-	-	-5
Carmel	12	0	0	-	-	12
Cwm y Glo	13	6	11	-	-	-4
Dinas (Llanwnda)	8	2	0	-	-	6
Dinas Dinlle	5	1	2	-	-	2
Dolydd a Maen Coch	4	1	0	-	-	3
Efailnewydd	8	3	0	-	-	5
Garndolbenmaen	12	0	0	-	-	12
Garreg-	10	2	0	-	-	8

Settlement	Indicative Growth Level (a)	Units Completed (2011-15) (b)	Windfall Sites Landbank (April 2015) (c)	Housing Allocations		Expected growth level of new windfall sites (dd) = (a) – [(b)+(c)+(ch)+(d)]
				With Planning Permission (April 15) (ch)	Without Planning Permission (April 15) (d)	
Llanfrothen						
Groeslon	13	2	0	-	-	11
Llandwrog	7	1	0	-	-	6
Llandygai	8	1	15	-	-	-8
Llangybi	4	1	0	-	-	3
Llanllyfni	9	1	2	-	-	6
Llanystumdwy	10	0	1	-	-	9
Nantlle	6	0	0	-	-	6
Penisarwaun	8	3	1	-	-	4
Pentref Uchaf	4	0	1	-	-	3
Rhiwlas	9	1	1	-	-	7
Rhosgadfan	9	0	4	-	-	5
Rhostryfan	10	7	12	-	-	-9
Sarn Mellteyrn	11	0	3	-	-	8
Talysarn	13	2	3	-	-	8
Tregarth	13	0	2	-	-	11
Trefor	13	4	4	-	-	5
Tudweiliog	12	2	4	-	-	6
Waunfawr	13	7	9	-	-	-3
Y Fron	6	0	2	-	-	4
TOTAL	273	52	91	-	-	130

Table 8 – Local Villages – Anglesey

Settlement	Indicative Growth Level (a)	Units Completed (2011-15) (b)	Windfall Sites Landbank (April 2015) (c)	Housing Allocations		Expected growth level of new windfall sites (dd) = (a) – [(b)+(c)+(ch)+(d)]
				With Planning Permission (April 15) (ch)	Without Planning Permission (April 15) (d)	
Bethel	16	2	0	-	-	14
Bodffordd	22	2	0	-	-	20
Bryngwran	25	3	18	-	-	4
Brynsiencyn	29	1	10	-	-	18
Caergeiliog	20	0	4	-	-	16
Dwyran	26	11	25	-	-	-10
Llandegfan	27	0	11	-	-	16
Llanddaniel Fab	23	13	5	-	-	5
Llanfachraeth	27	2	7	-	-	18
Llanfaethlu	12	2	7	-	-	3
Llanfechell	24	1	22	-	-	1
Llanfihangel yn Nhowyn	22	0	1	-	-	21
Llangaffo	19	0	0	-	-	19
Llangristiolus	15	13	9	-	-	-7
Llanrhyddlad	7	0	3	-	-	4
Pencarnisiog	11	0	2	-	-	9
Penysarn	28	0	6	-	-	22
Rhosybol	24	3	14	-	-	7
Talwrn	20	6	4	-	-	10
Tregele	10	1	2	-	-	7
TOTAL	407	60	150	-	-	197

Table 9 – Rural and Coastal Villages – Gwynedd

Settlement	Indicative Growth Level (a)	Units Completed (2011-15) (b)	Windfall Sites Landbank (April 2015) (c)	Housing Allocations		Expected growth level of new windfall sites (dd) = (a) – [(b)+(c)+(ch)+(d)]
				With Planning Permission (April 15) (ch)	Without Planning Permission (April 15) (d)	
Aberdaron	13	4	2	-	-	7
Borth y Gest	10	0	3	-	-	7
Clynnog Fawr	10	1	1	-	-	8
Corris	14	0	0	-	-	14
Edern	12	0	11	-	-	1
Fairbourne	0	4	5	-	-	-9
Llanaelhaearn	15	2	1	-	-	12
Llangian	4	0	0	-	-	4
Llanbedrog	16	16	3	-	-	-3
Llithfaen	9	4	1	-	-	4
Morfa Bychan	10	6	7	-	-	-3
Morfa Nefyn	15	26	12	-	-	-23
Mynytho	13	7	2	-	-	4
Rhoshirwaun	6	2	2	-	-	2
Sarn Bach	4	0	0	-	-	4
Y Felinheli	19	67	47	-	-	-95
TOTAL	170	139	97	-	-	-66

Table 10 – Rural and Coastal Villages – Ynys Môn

Settlement	Indicative Growth Level (a)	Units Completed (2011-15) (b)	Windfall Sites Landbank (April 2015) (c)	Housing Allocations		Expected growth level of new windfall sites (dd) = (a) – [(b)+(c)+(ch)+(d)]
				With Planning Permission (April 15) (ch)	Without Planning Permission (April 15) (d)	
Aberffraw	20	4	7	-	-	9
Carreglefn	11	2	2	-	-	7
Pont Rhyd y Bont	17	4	10	-	-	3
Llanbedrgoch	11	2	6	-	-	3
Llanddona	20	0	11	-	-	9
Llanfaelog	20	0	11	-	-	9
Llangoed	27	5	13	-	-	9
Malltraeth	16	0	3	-	-	13
Moelfre	32	12	2	-	-	18
Trearddur	32	28	49	-	-	-45
TOTAL	206	57	114	-	-	35

Table 11 – Clusters – Gwynedd

Settlement	Indicative Growth Level (a)	Units Completed (2011-15) (b)	Windfall Sites Landbank (April 2015) (c)	Housing Allocations		Expected growth level of new windfall sites (dd) = (a) – [(b)+(c)+(ch)+(d)]
				With Planning Permission (April 15) (ch)	Without Planning Permission (April 15) (d)	
Aberdesach	2	0*	0	-	-	2

Settlement	Indicative Growth Level (a)	Units Completed (2011-15) (b)	Windfall Sites Landbank (April 2015) (c)	Housing Allocations		Expected growth level of new windfall sites (dd) = (a) – [(b)+(c)+(ch)+(d)]
				With Planning Permission (April 15) (ch)	Without Planning Permission (April 15) (d)	
Aberllefenni	2	0	0	-	-	2
Aberpwll	2	0	0	-	-	2
Bethesda Bach	2	5	0	-	-	-3
Bryncir	2	0	0	-	-	2
Bryncroes	2	1	1	-	-	0
Bryn Eglwys	2	0*	0	-	-	2
Bwlchtocyn	2	0	0	-	-	2
Penrhos (Caeathro)	2	0*	0	-	-	2
Caerhun/Waen Wen	2	0*	1	-	-	1
Capel Uchaf	2	0*	0	-	-	2
Capel y Graig	2	0*	0	-	-	2
Ceidio	2	0*	0	-	-	2
Corris Uchaf	2	1	1	-	-	0
Crawia	2	0*	0	-	-	2
Dinas (Llŷn)	2	0	0	-	-	2
Dinorwig	2	0	0	-	-	2
Friog	2	0*	0	-	-	2
Gallt y Foel	2	0	0	-	-	2
Glasinfryn	2	2	0	-	-	0
Groeslon Waunfawr	2	0	0	-	-	2
Llanaber	2	0*	0	-	-	2
Llandderfel	2	2	1	-	-	-1

Settlement	Indicative Growth Level (a)	Units Completed (2011-15) (b)	Windfall Sites Landbank (April 2015) (c)	Housing Allocations		Expected growth level of new windfall sites (dd) = (a) – [(b)+(c)+(ch)+(d)]
				With Planning Permission (April 15) (ch)	Without Planning Permission (April 15) (d)	
Llanengan	2	0	6	-	-	-4
Llanfor	2	0	0	-	-	2
Llangwnadl	2	0*	1	-	-	1
Llaniestyn	2	0	1	-	-	1
Llanllechid	2	1	0	-	-	1
Llannor	2	1	0	-	-	1
Llanwnda	2	3	1	-	-	-2
Llwyn Hudol	2	0	0	-	-	2
Machroes	2	0*	0	-	-	2
Maes Tryfan	2	0*	0	-	-	2
Minffordd	2	0	0	-	-	2
Minffordd (Bangor)	2	0*	0	-	-	2
Mynydd Llandygai	2	1	0	-	-	1
Nebo	2	0	4	-	-	-2
Pantglas	2	0	0	-	-	2
Pencaenewydd	2	1	0	-	-	1
Penmorfa	2	0	0	-	-	2
Penrhos	2	0	0	-	-	2
Pentir	2	2	0	-	-	0
Pentrefelin	2	0	2	-	-	0
Pistyll	2	0	0	-	-	2
Pontllyfni	2	1	3	-	-	-2
Rhiw	2	0	1	-	-	1

Settlement	Indicative Growth Level (a)	Units Completed (2011-15) (b)	Windfall Sites Landbank (April 2015) (c)	Housing Allocations		Expected growth level of new windfall sites (dd) = (a) – [(b)+(c)+(ch)+(d)]
				With Planning Permission (April 15) (ch)	Without Planning Permission (April 15) (d)	
Rhos Isaf	2	0	4	-	-	-2
Rhoslan	2	0*	0	-	-	2
Rhydyclafdy	2	0	2	-	-	0
Saron (Llanwnda)	2	0	1	-	-	1
Sling	2	0*	0	-	-	2
Swan	2	0*	0	-	-	2
Tai'n Lon	2	0*	0	-	-	2
Talwaenydd	2	0*	0	-	-	2
Talybont	2	0	0	-	-	2
Tan y Coed	2	0	0	-	-	2
Treborth	2	0*	0	-	-	2
Ty'n-lon	2	0	0	-	-	2
Ty'n y Lon	2	0*	0	-	-	2
Waun (Penisarwaun)	2	0*	0	-	-	2
TOTAL	120	21	30	-	-	69

Table 12 – Clusters – Anglesey

Settlement	Indicative Growth Level (a)	Units Completed (2011-15) (b)	Windfall Sites Landbank (April 2015) (c)	Housing Allocations		Expected growth level of new windfall sites (dd) = (a) – [(b)+(c)+(ch)+(d)]
				With Planning Permission (April 15) (ch)	Without Planning Permission (April 15) (d)	
Bodorgan	2	0	0	-	-	2
Bro Iaddur (Trearddur)	2	0	0	-	-	2
Bryn Du	2	1	0	-	-	1
Brynminceg (Hen Llandegfan)	2	2	0	-	-	0
Brynrefail	2	0	1	-	-	1
Brynteg	2	4	2	-	-	-4
Bwlch Gwyn	2	0	1	-	-	1
Capel Coch	2	1	3	-	-	-2
Capel Mawr	2	2	2	-	-	-2
Capel Parc	2	0	0	-	-	2
Carmel	2	3	2	-	-	-3
Cerrigman	2	0	6	-	-	-4
Cichle	2	0	0	-	-	2
Haulfre (Llangoed)	2	0	0	-	-	2
Elim	2	0	3	-	-	-1
Glanyrafon	2	0	4	-	-	-2
Glyn Garth	2	0	0	-	-	2
Gorsaf Gaerwen	2	2	0	-	-	0
Hebron	2	0	0	-	-	2
Hendre Hywel (Pentraeth)	2	0	0	-	-	2
Hermon	2	2	2	-	-	-2

Settlement	Indicative Growth Level (a)	Units Completed (2011-15) (b)	Windfall Sites Landbank (April 2015) (c)	Housing Allocations		Expected growth level of new windfall sites (dd) = (a) – [(b)+(c)+(ch)+(d)]
				With Planning Permission (April 15) (ch)	Without Planning Permission (April 15) (d)	
Llanddeusant	2	0	9	-	-	-7
Llaneilian	2	0	0	-	-	2
Llanfaes	2	0	1	-	-	1
Llanfairynghornwy	2	1	0	-	-	1
Llangadwaladr	2	0	3	-	-	-1
Llansadwrn	2	1	1	-	-	0
Llanynghenedl	2	3	1	-	-	-2
Llynfaes	2	0	0	-	-	2
Marianglas	2	0	0	-	-	2
Mynydd Mechell	2	0	1	-	-	1
Nebo	2	1	4	-	-	-3
Penygroes	2	0	0	-	-	2
Pen y Marian	2	0	0	-	-	2
Pengorffwysfa	2	0	0	-	-	2
Penlon	2	0	5	-	-	-3
Penmon	2	0	0	-	-	2
Pentre Berw	2	11	20	-	-	-29
Pentre Canol (Caergybi)	2	0	1	-	-	1
Penygraigwen	2	0	0	-	-	2
Porth Llechog (Bull Bay)	2	7	23	-	-	-28
Rhoscefnhir	2	1	3	-	-	-2
Rhosmeirch	2	5	1	-	-	-4
Rhostrehwfa	2	2	0	-	-	0

Settlement	Indicative Growth Level (a)	Units Completed (2011-15) (b)	Windfall Sites Landbank (April 2015) (c)	Housing Allocations		Expected growth level of new windfall sites (dd) = (a) – [(b)+(c)+(ch)+(d)]
				With Planning Permission (April 15) (ch)	Without Planning Permission (April 15) (d)	
Bryn y Mor (Y Fali)	2	0	0	-	-	2
Rhydwyn	2	2	3	-	-	-3
Star	2	2	2	-	-	-2
Traeth Coch (Red Wharf Bay)	2	0	1	-	-	1
Trefor	2	0	2	-	-	0
Tyn Lon (Glan yr Afon)	2	0	0	-	-	2
Tynygongl	2	4	4	-	-	-6
TOTAL	102	57	111	-	-	-66

Table 13 – Countryside – Gwynedd

Settlement	Indicative Growth Level (a)	Units Completed (2011-15) (b)	Windfall Sites Landbank (April 2015) (c)	Housing Allocations		Expected growth level of new windfall sites (dd) = (a) – [(b)+(c)+(ch)+(d)]
				With Planning Permission (April 15) (ch)	Without Planning Permission (April 15) (d)	
Gwynedd Countryside	100	24	41	-	-	35

Table 14 – Countryside – Anglesey

Settlement	Indicative Growth Level (a)	Units Completed (2011-15) (b)	Windfall Sites Landbank (April 2015) (c)	Housing Allocations		Expected growth level of new windfall sites (dd) = (a) – [(b)+(c)+(ch)+(d)]
				With Planning Permission (April 15) (ch)	Without Planning Permission (April 15) (d)	
Anglesey Countryside	150	112	236	-	-	-198